

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

GEORGINA WILLIAMS,

Case No. 2:18-cv-11613

Plaintiff,

Oakland County Circuit Court Case
No. 18-165415-NO

v

OUTBACK STEAKHOUSE OF
FLORIDA, LLC,

Defendant.

STEVEN A. LEE (P77013)
CHRISTOPHER K. COOKE (P35034)
NEUMANN LAW GROUP
Attorney for Plaintiff
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DAVID J. YATES (P49405)
ERIC P. CONN (P64500)
STEPHANIE B. BURNSTEIN (P78800)
SEGAL McCAMBRIDGE SINGER &
MAHONEY
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NOTICE OF REMOVAL

TO: United States District Court - Eastern District of Michigan
Oakland County Circuit Court
Counsel of Record

NOW COMES Defendant, Outback Steakhouse of Florida, LLC, by and
through its attorneys, David J. Yates, Eric P. Conn, Stephanie B. Burnstein and
Segal McCambridge Singer & Mahoney and hereby remove this action and give
Notice to this Honorable Court of the Removal of this Action from the Circuit

Court of the State of Michigan, County of Oakland, to the United States District Court for the Eastern District of Michigan, and respectfully states under this Court as follows:

1. That Outback Steakhouse of Florida, LLC, is a Defendant in a civil action brought against it in the Circuit Court for the County of Oakland, State of Michigan, entitled *Georgina Williams v. Outback Steakhouse of Florida, LLC*, Case No. 18-165415-NO and that a copy of the Complaint is attached hereto and constitute all process and pleadings served upon Petitioner in such action (**Exhibit A**). No other proceedings have taken place in the Circuit Court for the County of Oakland.

2. That the above captioned matter is a civil action over which this Court has original jurisdiction on the provisions of Title 28 United States Code, USC Section 1332, and is one which may be removed to this Court by the Petitioners, Defendant herein, pursuant to the provisions of Title 28 United States Code, Section 1441, that it is a civil action, wherein the matter in controversy will allegedly exceed the sum or value of \$75,000.00 exclusive of costs, attorney fees, and statutory interest, according to the allegations in the Complaint and it is between citizens of different states, as more fully identified as follows:

a. Defendant, Outback Steakhouse of Florida, LLC., is a Florida corporation with its principle place of business in Florida;

- b. Plaintiff is a citizen of the State of California.
3. That in particularity based on the necessary implications of Plaintiff's Complaint, this matter in controversy allegedly exceeds the sum or value of \$75,000.00 exclusive of costs, attorney fees and statutory interest demanded in that the Plaintiff seeks damages for personal injury arising out of injuries allegedly incurred in a slip and fall accident dated February 19, 2017. Plaintiff has in her complaint alleged injuries such as fracturing her right shoulder, injuring her right elbow and right hip and suffering periods of disability, extreme pain, and mental and emotional distress.
4. That this Petition is filed in a timely and proper manner in as much as service of process upon Outback Steakhouse of Florida, LLC was made by certified mail on May 4, 2018, and the original Petition for Removal was filed within thirty (30) days thereof.

5. Attached as **Exhibit B** is a verification of the facts and circumstances set forth in this demand for removal.

THEREFORE, Defendant, Outback Steakhouse of Florida, LLC, gives Notice that the above Action now pending against it in the Circuit Court for the County of Oakland, State of Michigan, is removed therefrom to this Court.

SEGAL McCAMBRIDGE SINGER &
MAHONEY

By /s/ David J. Yates
DAVID J. YATES (P49405)
ERIC P. CONN (P64500)
STEPHANIE B. BURNSTEIN (P78800)
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39475 Thirteen Mile Road, Suite 203
Novi, MI 48377
(248) 994-0060

Dated: May 22, 2018

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

GEORGINA WILLIAMS,

Case No. 2:18-cv-11613

Plaintiff,

v

Oakland County Circuit Court Case
No. 18-165415-NO

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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2018, a copy of the foregoing Notice of Removal was filed and served electronically via the Court's electronic filing system (or, to the extent such service could not be accomplished because the recipients are not yet registered for electronic service, via first-class U.S. Mail, postage prepaid) to the following parties and counsel:

STEVEN A. LEE, ESQ.
Neumann Law Group
300 E. Front Street, Ste. 445
Traverse City, MI 49684

Clerk of the Court
Oakland County Circuit Court
1200 N. Telegraph Road
Pontiac, MI 48341

/s/ Kelly Solak _____